

WEIL, GOTSHAL & MANGES LLP

Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Jane Kim (#298192)
(jkim@kbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbkllp.com)
425 Market Street, 26th Floor
San Francisco, CA 94105
Tel: (415) 496-6723
Fax: (650) 636-9251

Attorneys for the Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)
Chapter 11
(Jointly Administered)

**STIPULATION REGARDING MOTION
OF LEAD PLAINTIFF PURSUANT TO
B.L.R. 9006-1 TO EXTEND TIME TO
FILE RESPONSE TO CERTAIN CLAIM
OBJECTIONS**

1 WHEREAS, on March 10, 2024, Public Employees Retirement Association of New
2 Mexico (“PERA”) filed the *Motion of Lead Plaintiff Pursuant to B.L.R. 9006-1 to Extend Time*
3 *to File Response to Certain Claim* (the “**Motion to Extend Time**”) [ECF No. 104330].

4 WHEREAS, PERA and PG&E Corporation and Pacific Gas and Electric Company, as
5 debtors and reorganized debtors, (collectively, the “**Reorganized Debtors**” and, together with
6 PERA, the “**Parties**”) have reached agreement with respect to a resolution of the Motion to
7 Extend Time and to the briefing and hearing schedule set forth in this Stipulation for the Claim
8 Objections, as defined herein.¹

9 NOW, THEREFORE, the Parties hereby stipulate and agree as follows, subject to
10 approval of the Court:

11 1. PERA shall have until March 15, 2024 to file its response to the Claim Objections
12 with respect to the securities claimants identified on **Exhibit A** annexed hereto (the
13 “**Response**”). The deadline to respond to the Claim Objections shall not be extended for any
14 person other than PERA and therefore the responses to the Claim Objections to be filed by any
15 claimant subject thereto, including each of the securities claimants identified on **Exhibit A**,
16 remains March 12, 2024.

17 2. The Reorganized Debtors agree to adjourn the hearing on the Claim Objections
18 solely as to the securities claimants identified on **Exhibit A** to a later date. PERA will not
19 oppose, or object to, the adjournment of (i) the hearing date for any of the Claim Objections, or
20 (ii) the Reorganized Debtors’ deadline to file a reply to the Response pursuant to Paragraph 1
21 hereof.

22 3. It is the position of the Reorganized Debtors that PERA does not have standing to

23 ¹ On December 13, 2023, the Reorganized Debtors filed the *Omnibus Objection to Securities*
24 *Claims (Twenty-Ninth) (Insufficient Substantive Allegations)* [Dkt. No. 14186], the *Omnibus*
25 *Objection to Securities Claims (Thirtieth) (Insufficient Substantive Allegations and Noteholder*
26 *Securities Claims)* [Dkt. No. 14189], the *Omnibus Objection to Securities Claims (Thirty-First)*
27 *(Insufficient Substantive Allegations and Securities ADR No Liability Claims)* [Dkt. No. 14193],
28 the *Omnibus Objection to Securities Claims (Thirty-Second) (Insufficient Substantive Allegations*
and Voluntary Release Claims) [Dkt. No. 14196], the *Omnibus Objection to Securities Claims*
(Thirty-Sixth) (Insufficient Substantive Allegations Claims) [Dkt. No. 14210], and the *Omnibus*
Objection to Securities Claims (Thirty-Seventh) (Insufficient Substantive Allegations Claims)
[Dkt. No. 14213] (collectively the “**Claim Objections**”).

1 file responses to the Claim Objections on behalf of the securities claimants identified on
2 **Exhibit A**. This Stipulation is without prejudice to either Party's rights concerning PERA's
3 authority and/or standing to file the Response on behalf of the securities claimants identified in
4 **Exhibit A**, and the Parties reserve their respective rights in that regard.

5 [Signatures on Next Page]
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1 March 15, 2024

2 **WEIL, GOTSHAL & MANGES LLP**
3 **KELLER & BENVENUTTI LLP**

4 By: /s/ Richard W. Slack
Richard W. Slack
Attorneys for Debtors and Reorganized Debtors

5 March 15, 2024

6 **LOWENSTEIN SANDLER LLP**

7 By: /s/ Michael S. Etkin
Michael S. Etkin (*pro hac vice*)
Special Bankruptcy Counsel to Lead Plaintiff and
8 *the Class*

9 - and -

10 **LABATON KELLER SUCHAROW LLP**
11 *Lead Counsel to Securities Lead Plaintiff and the*
12 *Class*

13 - and -

14 **MICHELSON LAW GROUP**
15 *Local Bankruptcy Counsel to Securities Lead*
Plaintiff and the Class

16 - and -

17 **ADAMSKI, MORISKI, MADDEN,**
18 **CUMBERLAND & GREEN LLP**
Liaison Counsel for the Class

19 - and -

20 **ROBBINS GELLER RUDMAN & DOWD LLP**
Counsel for the Securities Act Plaintiffs

21 - and -

22 **VANOVERBEKE, MICHAUD & TIMMONY,**
23 **P.C.**
Additional Counsel for the Securities Act Plaintiff